

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

|                               |   |                                           |
|-------------------------------|---|-------------------------------------------|
| (1) JOSHUA FIELDS             | ) |                                           |
|                               | ) |                                           |
| Plaintiff,                    | ) |                                           |
|                               | ) |                                           |
| v.                            | ) | 21-cv-00986-G                             |
|                               | ) |                                           |
| (1) GREAT LAKES INSURANCE SE, | ) | <i>Removed from the District Court of</i> |
| (2) MJ KELLY COMPANY, and     | ) | <i>Kay County, State of</i>               |
| (3) CAPSTONE ISG,             | ) | <i>Oklahoma, Case No. CJ-2021-00037</i>   |
|                               | ) |                                           |
| Defendants.                   | ) |                                           |

**DEFENDANT GREAT LAKES INSURANCE SE'S FINAL EXHIBIT LIST**

Defendant Great Lakes Insurance SE (“Defendant,” or Great Lakes”) anticipates introducing documents and materials from among the following into evidence at trial. Unless otherwise notes, Defendant expects all exhibits will be used affirmatively in its case in chief or in rebuttal of witness and exhibits offered by Plaintiff. Defendant will supplement, modify, or augment these submissions as necessary, due to any permissible changes by Plaintiff, additional discovery, and/or as otherwise provided by applicable rules or Court order.

**EXHIBIT LIST**

| <b><u>NO.</u></b> | <b><u>DESCRIPTION</u></b>                                                                             | <b><u>EXPECTED /<br/>MAY BE USED</u></b> |
|-------------------|-------------------------------------------------------------------------------------------------------|------------------------------------------|
| 1.                | Great Lakes Insurance SE policy issued to Plaintiff under policy No. BC003908.<br>GL-000042 – 000155. | Will be used.                            |
| 2.                | Property Loss Notice dated March 26, 2020<br>GL-000037 - 000039                                       | Will be used.                            |
| 3.                | Policy Declarations<br>GL-000008 – 000011                                                             | Will be used.                            |

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| 4.  | Protective Safeguards endorsement<br>GL-000099 - 000100                                                                                                                                                                                                                                                                                              | Will be used. |
| 5.  | Reliable Report Limited Multi-Peril survey dated May 1, 2015<br>GL – 001132 - 001140                                                                                                                                                                                                                                                                 | Will be used. |
| 6.  | Rimkus Consulting Group, Inc. Cause and Origin Report dated September 16, 2020<br>GL – 000741 - 000752                                                                                                                                                                                                                                               | Will be used. |
| 7.  | Capstone ISG Valuation Report and Photographs dated April 2, 2020<br>GL-000162 - 000344                                                                                                                                                                                                                                                              | Will be used. |
| 8.  | Repair Estimate dated April 2, 2020, with Photographs<br>GL – 000352 - 000468                                                                                                                                                                                                                                                                        | Will be used. |
| 9.  | Capstone ISG Reports to Bell & Clements Ltd.<br>A. GL – 000480 – 000675<br>B. GL – 000702 – 000705<br>C. GL – 000719 – 000721<br>D. GL – 000722 – 000736<br>E. GL – 000737 – 000773<br>F. GL – 000774 – 000779<br>G. GL – 000780 – 000787<br>H. GL – 000788 – 000850<br>I. GL – 000851 – 000853<br>J. GL – 000990 - 000992                           | May be used.  |
| 10. | Claims Notes Log<br>GL – 001045 - 001114                                                                                                                                                                                                                                                                                                             | May be used.  |
| 11. | Correspondence, notes, records and memoranda produced during discovery regarding Great Lakes’ claims handling and investigation of subject claim.<br>GL -- 000001 – 000041<br>GL -- 000156 – 000161<br>GL -- 000345 - 000351<br>GL – 000469 – 000478<br>GL – 000685 – 000701<br>GL – 000711 – 000718<br>GL – 000864 – 000865<br>GL – 000986 - 000989 | May be used.  |
| 12. | Transcript of Sworn Statement of Joshua Fields dated March 18, 2021, with Exhibit<br>GL – 001141 - 001198                                                                                                                                                                                                                                            | Will be used. |
| 13. | Capstone ISG Letter to Plaintiff dated April 28, 2020<br>GL – 000676 - 000679                                                                                                                                                                                                                                                                        | Will be used. |

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| 14. | Capstone ISG Letter to Plaintiff dated May 14, 2020<br>GL – 000706 - 000710                                                                                                 | Will be used. |
| 15. | Capstone ISG Letter to Plaintiff dated June 29, 2021<br>GL -- 000854 - 000859                                                                                               | Will be used. |
| 16. | Capstone ISG Letter to Plaintiff dated July 7, 2021<br>GL – 000866 - 000985                                                                                                 | Will be used. |
| 17. | Correspondence between Capstone ISG and Plaintiff/Plaintiff's Counsel regarding subject claim including<br>GL – 000475 – 000479 (April – May 2020 email)                    | May be used.  |
| 18. | Letter from City of Ponca City to Plaintiff dated April 21, 2020<br>GL – 000479                                                                                             | Will be used. |
| 19. | Correspondence between City of Ponca City and Plaintiff/Plaintiff's counsel regarding subject building and condemnation issues<br>FIELDS – 000003                           | May be used.  |
| 20. | Ponca City Adopted Codes and Ordinances, including International Building and Fire Codes, including, but not limited to:<br>GL – 000690 – 000701                            | Will be used. |
| 21. | Ponca City Fire Department Incident report March 24, 2020<br>PCFD-SDT -- 000001 - 000012                                                                                    | Will be used. |
| 22. | Ponca City Police Department Uniform Incident report dated 3/24/2022<br>PCPD-SDT – 000003 - 000007                                                                          | Will be used. |
| 23. | Ponca City Police Department Property Custody Form for evidence collected at scene of fire on March 24, 2020<br>PCPD-SDT -- 000008                                          | Will be used. |
| 24. | Oklahoma State Bureau of Investigation Criminalistics Examination Report dated June 16, 2020<br>PCPD-SDT - 000010                                                           | Will be used. |
| 25. | Oklahoma State Bureau of Investigation Lab Evidence Release Form dated July 21, 2020<br>PCPD-SDT - 000011                                                                   | Will be used. |
| 26. | Commercial Insurance Application submitted by Plaintiff dated May 2, 2019<br>GL – 001115 – 001132                                                                           | Will be used. |
| 27. | Documents produced by Kevin Randall Insurance pursuant to Plaintiff's subpoena(s) duces tecum, only to the extent proffered by Great Lakes<br>RANDALL-SDT – 00001 – 0000123 | May be used.  |

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| 28. | Documents and records (including audio and video files) produced by Ponca City Fire Department pursuant to Plaintiff's subpoena(s) duces tecum, only to the extent proffered by Great Lakes<br>PCFD-SDT – 000001 - 000012 | May be used.  |
| 29. | Documents and records produced by Ponca City Police Department pursuant to Plaintiff's subpoena(s) duces tecum, only to the extent proffered by Great Lakes<br>PCPD-SDT – 000001 - 000488                                 | May be used.  |
| 30. | Ponca City Police Department Radio & Call Log<br>PCPD-SDT – 000001 - 000002                                                                                                                                               | May be used.  |
| 31. | Ponca City Police Department 376 photographs taken at the scene of the fire.<br>PCPD – SDT – 000015 - 000390                                                                                                              | Will be used. |
| 32. | Ponca City Police Department emergency radio & call traffic audio files - 98 files for Case No. 20005975<br>PCPD – SDT – 000391 – 000488                                                                                  | May be used.  |
| 33. | Ponca City Police Department video files of body camera footage from responding officers at the scene of the fire<br>PCPD – SDT – 000013 – 000014                                                                         | Will be used. |
| 34. | Ponca City Police Department Sargent Brian Dye recorded interview of neighbors taken on 3/25/20<br>PCPD – SDT – 000012                                                                                                    | May be used.  |
| 35. | City of Ponca City Notice of Hearing for Condemnation<br>GL – 000479                                                                                                                                                      | May be used.  |
| 36. | Ponca City Utility billing statements for costs of roll-off dumpsters used for debris cleaning<br>FIELDS – 000001 - 000002                                                                                                | May be used.  |
| 37. | Plaintiff's Initial Disclosures and any exhibits thereto                                                                                                                                                                  | May be used.  |
| 38. | Great Lakes' Initial Disclosures and any exhibits thereto                                                                                                                                                                 | May be used.  |
| 39. | All documents produced by Plaintiff in discovery not objected to by Great Lakes and only to the extent proffered by Great Lakes, including<br>FIELDS – 00001 – 000026                                                     | May be used.  |
| 40. | All documents produced by Great Lakes in discovery and only to the extent proffered by Great Lakes<br>GL – 000001 - 001198                                                                                                |               |
| 41. | Any documents produced by any subpoenaed party not objected to by Great Lakes and only to the extent proffered by Great Lakes                                                                                             |               |
| 42. | Plaintiff's Answers to Interrogatories, Responses to Requests for Admissions, supplements and verifications thereto, only to the                                                                                          |               |

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|     | extent proffered by Great Lakes                                                                                                        |  |
| 43. | All deposition exhibits not objected to by Great Lakes and only to the extent proffered by Great Lakes                                 |  |
| 44. | All exhibits listed by Plaintiff not objected to by Great Lakes and only to the extent proffered by Great Lakes                        |  |
| 45. | Any documents, materials, media, or other tangible items produced by any party or third party during the course of remaining discovery |  |
| 46. | Pleadings and other submissions filed of record, including exhibits thereto, and only to the extent proffered by Great Lakes           |  |
| 47. | Demonstrative exhibits and visual aids                                                                                                 |  |
| 48. | Summary Exhibits and Timeline Exhibits                                                                                                 |  |
| 49. | Any exhibit necessary for rebuttal.                                                                                                    |  |

Respectfully submitted,

/s/ Sara E. Potts

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***Attorneys for Defendant Great Lakes  
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**CERTIFICATE OF SERVICE**

This certifies that on August 18, 2022, a true and correct copy of the foregoing document was served via the Court's electronic notification system to the following counsel of record:

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